

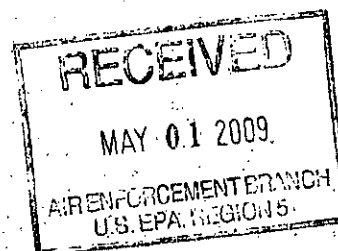


William Charles Waste Companies

5450 Wansford Way, Ste 201 • Rockford, IL 61109 • Phone: 815.963.7511 • Fax: 815.381.5647

April 30, 2009

Illinois Environmental Protection Agency (IEPA)
Division of Air Pollution Control
Compliance Section (MC 40)
P.O. Box 19276
1021 West Grand Avenue East
Springfield, IL 62794 - 9276



Re: 2008 Annual Compliance Certification Report
Winnebago Landfill
Title V - CAAPP Permit No. 99020102
Facility I.D. No. 201801AAF

Winnebago Reclamation Service respectfully submits the attached Annual Compliance Certification Report (Form 401-CAAPP), as required by Standard Permit Condition 9.8 of the above referenced permit. This Compliance Certification Report applies to the time January 1, 2008 through December 31, 2008.

If you have any questions, please contact me at (815) 963-7533.

Sincerely,

Winnebago Reclamation Service

Evan Buskohl
Environmental Manager

Attachment: Form 401-CAAPP

cc: IEPA, Air Regional Field Office - Peoria, IL
USEPA Region 5
Sultana Haque - Cornerstone Environmental Group, LLC



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
COMPLIANCE AND SYSTEMS MANAGEMENT SECTION
1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

RECEIVED

CAAPP ANNUAL COMPLIANCE CERTIFICATION	FOR AGENCY USE ONLY	
	ID NUMBER:	MAY 01 2009
	PERMIT #:	ENFORCEMENT BRANCH U.S. EPA REGION 5
	DATE:	

THE CLEAN AIR ACT PERMIT PROGRAM (CAAPP) REQUIRES THAT EACH CAAPP PERMIT HOLDER SUBMIT AN ANNUAL COMPLIANCE CERTIFICATION FOR ALL EMISSION UNITS AT THE SOURCE AS REQUIRED BY 40 CFR 70.6 (c) (5), 39.5 (7) (p) (v) OF THE ENVIRONMENTAL PROTECTION ACT AND CAAPP PERMIT CONDITION 9.8. THE COMPLIANCE CERTIFICATION REPORTING PERIOD IS JANUARY 1 TO DECEMBER 31 AND IS DUE ON OR BEFORE MAY 1 FOR THE PRECEDING CALENDAR YEAR. THIS CERTIFICATION FORM CAN BE USED BY FACILITIES TO SATISFY THIS REQUIREMENT.

SOURCE INFORMATION			
1) SOURCE NAME: Winnebago Landfill			
2) SOURCE ADDRESS: 8403 Lindenwood Road			
3) CITY: Rockford		4) COUNTY: Winnebago	
5) TOWNSHIP:	6) STATE: Illinois	7) ZIP CODE: 61109	
8) DATE FORM PREPARED: April 30, 2009		9) SOURCE ID NO.: 201801AAF	
10) CAAPP PERMIT NO.: 99020102			
10) CALENDAR YEAR OR REPORTING PERIOD COVERED BY THIS REPORT: January 1, 2008 through December 31, 2008			

SOURCE COMPLIANCE INFORMATION
12) CHECK EITHER (a) OR (b) BELOW:
(a) <input type="checkbox"/> During the entire reporting period, this source was in continuous compliance with ALL terms and conditions contained in its CAAPP permit. The method used to determine compliance for each term and condition is the method specified in the permit.
NOTE: If (a) is selected, completion of Table 1 is optional. Table 2 does not need to be completed.
(b) <input checked="" type="checkbox"/> With the exception of the items identified in Table 1 and Table 2, this source was in continuous compliance with all terms and conditions contained in the permit. The method used to determine compliance for each term and condition is the method specified in the permit, unless otherwise indicated.
NOTE: If (b) is selected, complete Tables 1 and 2 for those units and/or activities that are in intermittent or noncompliance status.

ATTACHMENTS

13) Are you submitting any attachments with this report? ☐ Yes ☒ No

If yes, please list the attachments below:

COMPLIANCE CERTIFICATION REPORT MAILING

14) In addition to submitting the Compliance Certification report to the Compliance and Systems Management Section (CASM), a copy of the Compliance Certification report must also be submitted to the USEPA Region 5 and the appropriate IEPA regional field office. Addresses are listed in condition 8.6 of your CAAPP permit.

Please check the appropriate boxes.

A copy of the Compliance Certification report has been submitted to USEPA.

☒ Yes ☐ No

A copy of the Compliance Certification report has been submitted to the appropriate IEPA regional field office.

☒ Yes ☐ No

SOURCE CONTACT PERSON

15) NAME OF TECHNICAL CONTACT PERSON FOR THIS REPORT: **Evan Buskohl**

16) TECHNICAL CONTACT PERSON TITLE:
Environmental Manager

17) CONTACT PERSON'S TELEPHONE NUMBER:
815-963-7533

COMPLIANCE STATEMENT AND SIGNATURE BLOCK

NOTE: A RESPONSIBLE OFFICIAL MUST SIGN THIS COMPLIANCE CERTIFICATION. UNSIGNED COMPLIANCE CERTIFICATIONS WILL BE RETURNED AS INCOMPLETE.

18) I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AUTHORIZED SIGNATURE:

BY:



AUTHORIZED SIGNATURE

Thomas Hilbert

TYPED OR PRINTED NAME OF SIGNATORY

Vice President

TITLE OF SIGNATORY

7 / 30 / 2009

DATE

Table 1. Listing of Compliance Status for Applicable Permit Terms and Conditions

Source Name		Source I. D. Number	
Winnabago Landfill		201801AAF	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
1.0	SOURCE IDENTIFICATION	C	Not Applicable – Section Title
1.1	Source		
1.2	Owner/Parent Company	C	Not Applicable – Administrative Information
1.3	Operator		
1.4	General Source Description		
2.0	LIST OF ABBREVIATIONS/ ACRONYMS USED IN THIS PERMIT	C	Not Applicable – Descriptive Information
3.0	INSIGNIFICANT ACTIVITIES	C	Not Applicable – Section Title
3.1	Identification of Insignificant Activities	C	Not Applicable – Descriptive Information
3.2	Compliance with Applicable Requirements	C	Operating procedures
3.3	Addition of Insignificant Activities	C	No notification required during the reporting period
4.0	SIGNIFICANT EMISSIONS UNITS AT THIS SOURCE	C	Not Applicable – Descriptive Information
5.0	OVERALL SOURCE CONDITIONS	C	Not Applicable – Section Title
5.1	Source Description	C	Not Applicable – Descriptive Information
5.2.1	Specific Emission Units Subject to Particular Regulations Mentioned in Section 7	C	Not Applicable - Instructions
5.2.2	Fugitive PM Emission and Opacity	C	Monitored and controlled dust on a weekly basis. Records kept.
5.2.3	Ozone Depleting Substances	C	Ozone depleting substances not accepted for disposal during the reporting period. Ozone depleting substances are handled by trained staff from a separate company.

Source Name		Source I. D. Number	
Winnebago Landfill		201801AAF	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status "C" Intermittent Noncompliance "N"	(4) Compliance Determination Method
5.2.4	Risk Management Plan	C	Not Applicable During Reporting Period.
5.2.5	Future Applicable Requirements	C	The facility was subject to 40 CFR part 60 and 40 CFR Part 63 prior to the beginning of the reporting period. SSM Plan developed on January 16, 2004. SSM Plan and records are filed on site. SSM forms are completed for applicable startups, shutdowns, and malfunctions. Semi-annual SSM Reports required during the reporting period were submitted on July 30, 2008 and January 21, 2009. Semi-annual NSPS reports required during the reporting period were submitted on August 25, 2008 and February 24, 2009.
5.2.6	Episode Action Plan	C	Not Applicable During Reporting Period.
5.3	Non-Applicability of Regulations of Concern	C	Not Applicable
5.4	Source-wide Operational and Production Limits and Work Practices	C	Monitored and controlled dust on a weekly basis. Records kept. Dust control plan is filed on site.
5.5	Source-wide Emission Limitations	C	Emissions calculated for significant units. Emissions limit were not exceeded. Design capacity did not change during the reporting period.
5.6	General Recordkeeping Requirements	C	Records Filed
5.7.1	General Source-Wide Reporting Requirements - Deviations	C	One monthly deviation report submitted on July 29, 2008. The deviation was also reported in the Semi-Annual CAAPP Report.
5.7.2	Annual Emissions Report	C	An Annual Emissions Report for calendar year 2008 was submitted April 29, 2009.
5.8	General Operational Flexibility/Anticipated Operating Scenarios.	C	Not Applicable – None
5.9	General Compliance Procedures	C	Emissions calculation procedures followed.
6.0	EMISSIONS REDUCTION MARKET SYSTEM (ERMS)	C	Not Applicable
7.0	UNIT SPECIFIC CONDITIONS	C	Not Applicable – Section Title
7.1	MSW Landfill -Utility (Open) Flare with Backup Enclosed Flare.	C	Not Applicable – Descriptive Information

Source Name		Source I.D. Number	
Winnebago Landfill		201801AAf	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
7.1.1 and 7.1.2	Description of Municipal Solid Waste Landfill List of Emission Units and Air Pollution Control Equipment	C	Not Applicable – Descriptive Information
7.1.3 a and 7.1.3 b	Applicability Provisions and Applicable Regulations	C	Not Applicable – Descriptive Information
7.1.3 c	Applicability Provisions and Applicable Regulations	C	GCCS Design Plan approved via permit number 99040045, issued July 6, 1999. GCCS is in place and record of operation of the existing GCCS.
7.1.3 d	Operate the collection system in accordance with the provisions of 40 CFR 60.753	I	<p>Operation of the GCCS and review maintained records that indicates:</p> <ul style="list-style-type: none"> Collection system was operated with negative pressure at each wellhead except one event as detailed in Table 2 Collection system was operated with temperature less than 55 °C and with an oxygen level less than 5 percent Collection system was operated with methane concentration less than 500 parts per million above background at the surface of the landfill Collection system was operated with the control or treatment system operating at all times when the collected gas was routed to the system.
7.1.3 e	Applicability Provisions and Applicable Regulations - Asbestos	C	The facility is active and accepted asbestos material during the reporting period. Waste records are kept. Proper cover is placed. Signage is posted.
7.1.3 f	Applicability Provisions and Applicable Regulations – Open Flare	C	Flare is designed and operated in accordance with 40 CFR 60.18.
7.1.4	Non-Applicability of Regulations of Concern	C	Not Applicable – Descriptive Information
7.1.5	Operational and Production Work Practices	C	Site follows requirements for proper coverage of material and proper recordkeeping.
7.1.6	Emissions Limitations	C	Emissions calculated for open flare and records kept on file. Enclosed flare and Soil Methane Vacuum System did not operate in 2008.
7.1.7	Testing Requirements	C	Landgen was used to calculate NMOC emissions. Emissions are greater than 50 Mg/year. GCCS has been installed.
7.1.8 a	Operate a gas flow rate measuring device that records the flow to the control system(s)	C	Continuous monitoring record maintained at site file.

Source Name		Source I. D. Number	
Winnebago Landfill		201801AAF	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
7.1.8 b	Compliance with 40 CFR 60 Subpart WWW – Monitoring Requirements	I	Review of operating record that indicated: <ul style="list-style-type: none"> Quarterly surface methane emissions monitoring were conducted and instrument specifications and procedures followed for higher than 500 ppm reading There were several instances where the North Unit flare and the engine #2 and the South Unit flare and engines #3 - #5 were down simultaneously for more than 1 hour as detailed in Table 2. Monthly monitoring of wellhead was conducted
7.1.9 a	Recordkeeping Requirements – General Records	C	Site specific NMOC emission rate records are kept on file. Records of monthly emissions from the control system are kept on file. Records of dust inspections are kept on file.
7.1.9 b	Recordkeeping Requirements – NSPS Records	C	Design Capacity Report is kept on file. Current amount of solid waste in-place and year-by-year records are kept on file. GCCS Design Plan approved via permit number 99040045. An as-built drawing of the GCCS is on file. Stack test results for the open flares are on file. Records of flow/presence of flame records are on file. Wellfield surface emissions monitoring records are kept on file.
7.1.9 c	Recordkeeping Requirements – NESHAP Records	C	Waste shipment records are kept on file. Records of the location, depth, and area, and quantity of ACWM is maintained on a map of the disposal area.
7.1.10 a	Reporting Requirements – Deviations	C	Deviation report submitted on July 29, 2008
7.1.10 b	Reporting Requirements – NSPS	C	NMOC emissions rate reported with 2006 annual emissions report on April 26, 2007. The site is active – a closure report was not applicable during the reporting period.
7.1.10 c	Reporting Requirements – Exceedance of Emission Limits	C	No deviation report was required as no exceedances of the emission limits in 7.1.3, 7.1.5, or 7.1.6 occurred during the reporting period.
7.1.11	Operational Flexibility/anticipated Operating Scenarios	C	Not Applicable – None
7.1.12 a	Estimating controlled methane, NMOC, and Specified Emissions	C	Records of compliance procedures followed.
7.1.12 b	Utility (Open) Flare Emissions Calculations	C	Records of compliance procedures followed.
7.1.12 c	Enclosed Flare Emission Calculations	C	Not Applicable – Enclosed flare did not operate during the reporting period.

Source Name		Source I. D. Number	
Winebago Landfill		201801AAf	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status "C" Intermittent Noncompliance "N"	(4) Compliance Determination Method
7.1.12 d	Compliance with 40 CFR 60 Subpart WWW-Standards of Performance for MSW Landfills	C	CCCS Design Plan approved via permit number 99040045. Monthly wellhead monitoring performed, all necessary corrective actions undertaken in accordance with the permit conditions, quarterly surface emissions monitoring performed, monthly cover integrity monitoring conducted. Records are kept on file.
7.1.12 e	Compliance with Condition 7.1.3(e)(i)	C	Gas collection system installed. Gas extraction wells were installed in areas of waste that has been in place for 5 years or more.
7.1.12 f	Calculating Uncontrolled NMOC and VOC Emissions	C	Records of compliance procedures followed to calculate NMOC and VOM emissions.
7.2 - 7.2.2	Gasoline Tank	C	Not Applicable - Descriptive Information
7.2.3	Applicability Provisions and Applicable Regulations	C	A permanent submerged fill loading device is in place and used. Emissions determined using TANKS 4.0
7.2.4	Non-Applicability of Regulations of Concern	C	Not Applicable
7.2.5	Operational and Production Limits and Work Practices	C	A permanent submerged fill loading device is in place and used.
7.2.6 - 7.2.8	Emission Limitations, Testing Requirements, Monitoring Requirements	C	Not Applicable - None
7.2.9	Recordkeeping Requirements	C	Records Maintained
7.2.10	Reporting Requirements	C	No deviations or exceedance of limits during the reporting period.
7.2.11	Operational Flexibility/Anticipated Operating Scenarios	C	Not Applicable - None
7.2.12	Compliance Procedures	C	Instructions. TANKS 4.0 used to calculate emissions.
8.0	General Permit Conditions	C	Not Applicable - Section Title
8.1	Permit Shield	C	Not Applicable - Descriptive Information
8.2	Applicability of Title IV Requirements	C	Not Applicable

Source Name		Source I. D. Number	
Winnebago Landfill		201801AAF	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
8.3	Emission Trading Program	C	Not Applicable
8.4	Operational Flexibility/Anticipated Operating Scenarios	C	No Changes Were Made During the Reporting Period.
8.5	Testing Procedure	C	No testing was required or conducted during the reporting period.
8.6	Reporting Requirements	C	Not Applicable – Section Title
8.6.1	Monitoring Reports	C	Semi-Annual Compliance Reports required during calendar year 2006 were submitted August 25, 2008 and February 24, 2009.
8.6.2	Test Notifications	C	No test notification was required during the reporting period.
8.6.3	Test Reports	C	No tests performed during the reporting period.
8.6.4	Reporting Address	C	Descriptive Information Reports submitted to appropriate addresses.
8.7	Obligation to Comply with Title I Requirements	C	Not Applicable - Descriptive Information
9.0	STANDARD PERMIT CONDITIONS	C	Not Applicable – Section Title
9.1 – 9.5	Standard Permit Conditions	C	Descriptive Information Fees Paid. Equipment Maintained. Inspections Allowed.
9.6	Recordkeeping	C	Records are Maintained in Accordance with Permit Conditions.
9.7	Annual Emissions Report	C	An Annual Emissions Report for calendar year 2007 was submitted on April 29, 2008.
9.8	Requirements for Compliance Certification	C	An Annual Compliance Certification for calendar year 2007 was submitted on April 24, 2008.
9.9	Certification	C	Certification was included with all required reports.
9.10	Defense to Enforcement Actions	C	No emergency occurred during the reporting period.

Source Name		Source I. D. Number	
Winnebago Landfill		201801AAF	
(1) Permit Condition Reference Number	(2) Description of Permit Condition	(3) Compliance Status Continuous "C" Intermittent "I" Noncompliance "N"	(4) Compliance Determination Method
9.11	Permanent Shutdown	C	Descriptive Information No shutdown occurred during the reporting period.
9.12	Reopening and Reissuing Permit for Clause	C	Not applicable during the reporting period.
9.13	Severability Clause	C	Not Applicable - Descriptive Information
9.14	Permit Expiration and Renewal	C	Permit expired in December 30, 2007 and a permit renewal application was submitted on March 13, 2007.
10.0	Attachments	C	Not Applicable - Section Title
10.1	Attachment 1	C	Descriptive Information and/or Future Applicable Requirements
10.2	Attachment 2		
10.3	Attachment 3		
10.4	Attachment 4		
10.5	Attachment 5		

Table 2. Deviation Summary Report

Source Name					Source I. D. Number	
Winnebago Landfill					201801AAf	
(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period End Date	(5) Description and Cause of Deviation	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations
7.1.3 d	Operate the collection system with negative pressure at each wellhead	June 2, 2008	July 8, 2008	Well GW191 showed positive pressure reading on June 2, 2008. Investigation indicated plugging of the lateral causing restriction of vacuum applied to the well.	Corrective actions, such as, wellhead adjustments were undertaken within 5 days and re-monitoring was performed within 15 days. However, negative pressure could not be obtained by the 15th day following the initial monitoring event. On June 18, 2008, Winnebago submitted a letter to the USEPA Region 5 requesting alternate compliance timeline of September 30, 2008 or 120 days from the date of the initial exceedance to accomplish the necessary corrective action. On July 8, 2008, the nearby leachate storage tank was found to be completely full after having been pumped empty only a few weeks earlier. Typically, this tank receives a trickle flow and only requires pumping a few times a year. Coincidentally, at this time well GW191 was found to have vacuum, and was back in compliance. The facility believes that the debris plugging the collection header pipe broke free on its own and the backed-up condensate promptly filled the tank.	The facility will continue monthly tuning of the wellfield and will track compliance of wells during the monthly monitoring events.

Source Name				Source I. D. Number		
Winnebago Landfill				201801AAF		
(1) Permit Condition Reference	(2) Description of Permit Condition	(3) Deviation Period Start Date	(4) Deviation Period End Date	(5) Description and Cause of Deviation	(6) Corrective Action(s) Taken to Remedy Deviation	(7) Measure(s) Taken to Prevent Future Deviations
7.1.8 b	Duration of start-up, shutdown, or malfunction shall not exceed 1 hour for treatment or control devices.	January 1, 2008 Intermittently	December 31, 2008 Intermittently	North Unit flare and the engine No. 2 and the South Unit flare and engine Nos. 3, 4 and 5 were down simultaneously for more than 1 hour due to maintenance, lightning, engine breakers trip, breaker lockout, gas field repair, frozen blower skid, cold cylinders etc.	Each downtime was minimized and the engines were re-started as soon as possible. No landfill gas was released to the atmosphere during the shutdowns since the gas collection system is automatically closed off when the control device is shutdown.	Continue to monitor open flares operation and engines operation and repair any major malfunctions as to limit the downtime of both flares. Refer to Semi-Annual CAAPP monitoring reports (previously submitted) for more details.